IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED CENTRAL BANK)
Plaintiff,))
V.) Case No. 10-CV-00331
KANAN FASHIONS, INC., et al.,) Judge Robert Gettleman
Defendants.) Magistrate Michael Mason

THE BANK'S MOTION FOR ENTRY OF A PROTECTIVE ORDER GOVERNING DISCOVERY

Plaintiff United Central Bank ("the Bank"), by and through its counsel Boodell & Domanskis, LLC, for its Motion for Entry of a Protective Order Governing Discovery, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, states as follows:

- 1. The Bank submitted a proposed protective order to Defendants on July 17, 2010. Over the past several weeks, the parties have exchanged four complete rounds of proposed revisions and reached agreement on the majority of the provisions in the proposed protective order. A copy of the Bank's proposed protective order is attached hereto as **Exhibit A**.
- 2. Counsel for the Bank and Counsel for Defendants also had two telephone conferences on August 13th to discuss certain provisions the Parties still had not come to agreement on. Although additional progress was made during the telephone conferences, the Parties have not been able to fully agree on the language of the proposed protective order.
- 3. The Bank has worked diligently to try to reach agreement with Defendants regarding the terms of a protective order. To that end, the Bank has, in good faith, accepted every proposed revision it can reasonably accept while still ensuring that it is protecting its interests and the interests of any subpoenaed third parties that will need the protections afforded by the proposed protective order.
- 4. The proposed protective order is designed to protect the interests of the Parties to this litigation, including the Bank, and any subpoenaed parties.

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5. As a competitive business, and a financial institution, the Bank has a special need

to protect its proprietary information, business practices, security practices, competitive

information, and other trade secrets. The Bank is also obligated to protect the confidential

information of its customers, including their personally identifiable information and their

financial data.

6. The proposed protective order ensures that the Parties and subpoena respondents

meet their discovery obligations, while providing appropriate, and necessary protection for their

confidential documents and information. It contains procedures allowing the parties to modify

certain of its restrictions if the need arises, and they agree to do so in writing. It also provides

protections to ensure that the terms of the protective order are followed, and that any

disagreements regarding the designation of a given document or information can be raised and

resolved by the Parties, or, if needed, by the Court.

WHEREFORE, the Bank respectfully requests that this Court enter a Protective Order in

the form attached hereto as Exhibit A.

Respectfully submitted,

UNITED CENTRAL BANK

Date: August 13, 2010

/s/Nada Djordjevic By:

One of its Attorneys

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